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May 21, 2021

**BY ECF**

Honorable Alvin K. Hellerstein  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

So Ordered.

/s/ Hon. Alvin K. Hellerstein  
May 24, 2021

Re: Shargani v. City of New York, et al.  
Docket No. 21 CV 00337 (AKH)(OTW)

Dear Judge Hellerstein:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, recently assigned to represent Defendants the New York City Department of Environmental Protection ("DEP") and the City of New York (hereinafter "City Defendants")<sup>1</sup> in the above-referenced action. I write to respectfully request that Your Honor extend the time for the City Defendants to respond to the complaint in this action from May 30, 2021 to June 11, 2021. Counsel for Plaintiff consents to this request.

Plaintiff Paul Shargani, who identifies as an Iranian Jewish man, brings this action against the City of New York, DEP, and Dennis Delaney, contending that they discriminated against him during the course of his employment with DEP on the basis on his race, national origin, and religion in violation of 42 U.S.C. §§ 2000e, *et seq.* ("Title VII"), New York State Executive Law §§ 290, *et seq.* ("SHRL") and New York City Administrative Code §§ 8-101, *et seq.* ("CHRL"). Plaintiff Shargani also alleges retaliation in violation of the same federal and state laws for having complained of the alleged discrimination. In support of his claim, Plaintiff Shargani contends that Thomas Marrama, a former DEP Supervisor, heard discriminatory comments allegedly made by Defendant Delaney.

The requested extension of time is necessary in order to allow the undersigned to receive additional information from my clients regarding the facts of the case, which is necessary to formulate an appropriate response to the complaint. Moreover, this office is still investigating service of the summons and complaint on the individually named Defendant, Dennis Delaney,

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<sup>1</sup> Upon information and belief, individually named defendant Dennis Delaney has not yet been served.

and, if service has been effectuated, additional time is needed to make a determination pursuant to Section 50-k of the New York General Municipal Law as to whether this office will represent him. In addition, this office, without appearing on behalf of individually named defendant Delaney, requests that the Court also extend, sua sponte, the time for defendant Delaney to respond to the complaint until June 11, 2021 in order to preserve his rights while the aforementioned service and representation inquiries are made.

This is the second such request of this Court for additional time. There are no other currently scheduled deadlines that would be affected by this request. Accordingly, Defendants respectfully requests that its time to respond to the Complaint be extended until June 11, 2021.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,  
*/s/ Dominique F. Saint-Fort*  
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